## REMARKS

The Examiner has rejected claims 15 through 18, 37 through 40 and 59 through 62 under 35 U.S.C. §102(e) in the currently pending Office Action.

The undersigned appreciates a telephonic interview of June 9, 2008 on behalf of the applicant. As discussed and summarized in an Interview Summary, the undersigned has explained the applicant's position in understanding the disclosure of the cited reference with respect to Module D in Figure 9.

In view of the following remarks, the Applicant respectfully submits to the Examiner to reconsider the pending rejections. No amendment has been made to the pending claims in the current response.

### The Section 102(e) Rejections

The Examiner has rejected claims 15 through 18, 37 through 40 and 59 through 62 under 35 U.S.C. §102(e) as allegedly being anticipated by the Delinger et al. reference. With respect to the previous arguments filed by the Applicant, the Examiner has responded on page 8 of the pending Office Action that the Delinger et al. reference "teaches a selectivity value corresponding to the highest selectivity value among the N libraries" and "the word with the highest selectivity value (among the libraries) would be chosen for a search." The Examiner further indicated on the same page that Paragraphs [162] and [163] of the Delinger et al. reference disclose the words having the highest selectivity value selected from the converted descriptive database for the "word candidates" as recited in the independent claim. Thus, the Examiner has concluded that the cited reference anticipates the avoidance of a certain word candidate in the search words.

Currently pending independent claims 15, 37 and 59 each explicitly recite "determining a database occurrence value based upon the first text database occurrence value and the second text database occurrence value in a predetermined manner so that the word candidates substantially more occurring in one of the first text database and the second text database but substantially less occurring in the other one of the first text database and the second text database are avoided in the search words" and "the first text database containing certain vocabulary and sentences written in a certain style that are substantially different from those in the second text database." [emphasis added]. In other words, the invention as explicitly recited in currently pending independent claims 15, 37 and 59 avoids in the "search words" certain "word candidates" that appear more frequently in one text database but less frequently in the other database to be searched.

These "search words" are selected from "the first text database containing certain vocabulary and sentences written in a certain style that are substantially different from those in the second text database." As the specification describes on pages 9 through 12, the "style" is associated with the specific area occurrence or portion such as a header, a summary or other text areas. As also described on page 2 of the specification, the style, vocabulary and content of a short keyword input do not relatively affect the search, but the style, vocabulary and content of a long search request substantially affect the search. In particular, when a search request grossly differs from the text to be searched in style, vocabulary and content, the effect is substantial. For example, if a newspaper article is a search request while a patent publication is a text to be searched, the retrieval effectiveness is undesirably degraded. In a detailed example, the word, "sale" is often seen in the newspaper but is rarely seen in the patent publication. In general, a word is considered important when its occurrence has a less frequency in the text database to be searched. For this reason, in the same example, the word, "sale" is unfortunately considered to be an important search word.

Based upon the above quoted two patentable features of the independent claims, the current invention thus successfully avoids these certain "word candidates" in "selecting the search words."

In view of the above explicitly recited patentable features, the Applicants understand the disclosures of the Dehlinger et al. reference in the following manner. Despite the characterization by the Examiner, the Dehlinger et al. reference does not appear to disclose every subject matter limitations of previously amended independent claims 15, 37 and 59. For example, the Examiner has cited Paragraphs [162] and [0163] for allegedly anticipating the following patentable feature, "the word candidates substantially more occurring in one of the first text database and the second text database but substantially less occurring in the other one of the first text database and the second text database are avoided in the search words." To support the allegation, the Examiner has stated that "each word in the descriptive word database is associated with a selectivity value corresponding to the highest selectivity value among the N libraries" on page 8 of the Office Action. Furthermore, the Examiner has stated that "[t]the descriptive words are given a selectivity value which is based upon their occurrence in each library" on page 8.

The Dehlinger et al. reference generally discloses a "text-processing" and search system and method to search certain words of interest in text databases or libraries. Initially, databases or libraries are generated from "processed text," which includes a list of non-generic words and text, library, text-specific word-specific identifiers associated with each word. (Paragraphs [0076] and [0077]). In addition, each words also has a selectivity value reflecting "the frequency occurrence in a library of text in a selected field, relative to the frequency of occurrence of the same word in one or more other libraries of text in one or more other fields." (Paragraph [0078]). The database generally contains "descriptive words" having a selectivity value above a predetermined threshold value. (Paragraph [0081]). After certain generic words and verb roots are

removed from input text to generate non-generic words or target text, a search is made using the remaining terms having a selectivity value above a predetermined threshold value against the above described databases or libraries. (Paragraphs [0085] through [0087]).

In more detail, the Dehlinger et al. reference determines the highest selectivity value as the selectivity value of a word after determining the selectivity value for each of the N libraries as disclosed in Paragraphs [159] through [163]. Furthermore, the selectivity value is determined as **Ow/Ow**, which means that the frequency of occurrence Ow of that in library I divided by the frequency of occurrence Ow of that in all libraries other than library I of the N libraries. Since it is a division in the equation, the selectivity value becomes a high value if the word appears frequently in library I but rarely in all libraries other than library I of the N libraries. This point is confirmed by the numerical example given in Paragraph [162]. Finally, the search words are determined based upon the input words by comparing against the above determined selectivity value as disclosed in Paragraph [173]. Based upon the disclosure of the cited reference, the search words consequently include the words that appear frequently in one library but rarely in all other libraries.

The cited references fails to anticipate certain patentable features of the current invention as explicitly recited in currently pending independent claims 15, 37 and 59. The cited references fail to anticipate the avoidance of the words having the highest selectivity value in an inputted search text. Currently pending independent claims 15, 37 and 59 calls for "the word candidates substantially more occurring in one of the first text database and the second text database but substantially less occurring in the other one of the first text database and the second text database [to be] avoided in the search words" and "the first text database containing certain vocabulary and sentences written in a certain style that are substantially different from those in the second text database." [emphasis added]. Although the Dehlinger et al. reference discloses "patents" and

"case reporters" as databases, no explicit disclosure is provided for avoiding "the word candidates substantially more occurring in one of the first text database and the second text database but substantially less occurring in the other one of the first text database and the second text database."

As supported by the original disclosures on pages 12 through 14 of the current application under examination, the second preferred embodiment of the current invention two databases containing different vocabulary and styles such as a patent database and a newspaper database. (lines 28 and 29, page 12). Although the word frequency occurrence is small in one database, it is generally considered as useful as a search word, "the database occurrence determination unit 33 takes into account a difference in the occurrence value between the first text database 31 and the second text database 32 in determining the significance value." (lines 12 through 14, page 13). Consequently, the current invention provides that "a search word is not likely selected from words that are used frequently in the first text database 31 but are not frequently used in the second text database 32." (lines 10 through 12, page 14).

As already described, the current specification describes on pages 2 and 9 through 12, the "style" is associated with the specific area occurrence or portion such as a header, a summary or other text areas. The style, vocabulary and content of a long search request substantially affect the search, and when a search request grossly differs from the text to be searched in style, vocabulary and content, the effect is substantial. In a detailed example, the word, "sale" is often seen in the newspaper but is rarely seen in the patent publication. In general, a word is considered important when its occurrence has a less frequency in the text database to be searched.

Dependent claims 16 through 18, 38 through 40 and 60 through 62 ultimately depend from currently pending independent claims 15, 37 or 59 and incorporate the patentable features of the currently pending independent claims. Therefore, the

applicants respectfully submit to the Examiner that the rejections of pending claims 15 through 18, 37 through 40 and 59 through 62 under 35 U.S.C. §102(e) as allegedly being anticipated by Dehlinger et al. should be withdrawn.

## Conclusion

In view of the above amendments and the foregoing remarks, Applicant respectfully submits that all of the pending claims are in condition for allowance and respectfully request a favorable Office Action so indicating.

Respectfully submitted,

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